

1 Hon. Theresa B. Doyle
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8 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
9 FOR KING COUNTY

10 RICHARD LEE,)
11 Plaintiff,) No. 14-2-09292-0 SEA
12 vs.)
13 CITY OF SEATTLE, SEATTLE POLICE) DELCARATION OF FRANCES BEAN
14 DEPARTMENT and SPD INTERIM CHIEF) COBAIN
15 HARRY BAILEY and SPD DETECTIVE)
16 MIKE CIESYNSKI,)
17 Defendants.)
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DECLARATION OF FRANCES BEAN COBAIN-

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1 **DECLARATION OF FRANCES BEAN COBAIN**

2 I, Frances Bean Cobain, declare under penalty of perjury under the laws of the State of
3 Washington as follows:

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5 1. I am Kurt Cobain's daughter. I am over 18 years of age and I am competent to
6 testify. I have personal knowledge of the matters below and could and would testify to them.

7 2. I understand that Richard Lee has filed a lawsuit against the City of Seattle and the
8 Seattle Police Department to try to force them to release never-before-released graphic
9 photographs law enforcement personnel took at the scene of my father's death, so that Mr. Lee can
10 publicize them.

11 3. I once saw mock photos depicting my father's body. That experience irreparably
12 scarred me. I cried for days afterward. Those horrible images still haunt me. I cannot imagine
13 how terrible it would be knowing that the photographs that Mr. Lee seeks were public, and that I
14 or any of my loved ones, including my father's mother and sisters, might inadvertently see them.
15 Release and publication of the photographs would shock me and exacerbate the posttraumatic
16 stress that I have suffered since childhood.

17 4. Releasing the photographs also would physically endanger me and my mother. My
18 mother and I both receive a constant stream of death threats from very disturbed individuals who
19 are obsessed with my father. Once, a stalker broke into my home while I was on vacation, and
20 laid in wait for three days. This person's twisted explanation was that he was meant to be with me
21 because my father's soul had entered my body.

22 5. Releasing these photographs into the public domain would encourage more
23 disturbed stalkers and fanatical threats. It would make me feel even more unsafe in public and
24 make me more fearful for myself and my family's safety. I would have to delete all of my social
25 media to prevent receiving the photographs.

26 6. I was less than two years old when my father died. I have worked hard to know
27 him from stories from friends and family, photographs, and from his art, as the living person who
28 was my parent. I do not want that image to be stained by the knowledge that these horrible

1 photographs are public and that I might be exposed to them. I have had to cope with many
2 personal issues because of my father's death. Coping even with the possibility that those
3 photographs could be made public is very difficult.

4 7. I am not the only person who would be irreparably scarred by public disclosure of
5 the photographs. Although disclosure and publication of the pictures would harm all of the family
6 and friends who loved my father, his parents (my grandmother and grandfather) and his sisters and
7 brother (by aunts and uncle), would be especially vulnerable to emotional pain and trauma from
8 knowledge that the pictures were public.

9 8. The tragedy of my father's death is a personal and private matter for me, his other
10 family members, and his friends. Further sensationalizing it through the release of these pictures
11 would cause us indescribable pain.

Signed at Los Angeles, California on July 20, 2015.

Frances Bean Cobain